

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BETSY FEIST, on behalf of herself and all others
similarly situated,

Plaintiff,

-against-

RCN CORPORATION and PAXFIRE, INC.,

Defendants.

Civil Action No. 11-CV-5436
(JGK)

**STIPULATION AND
[PROPOSED] ORDER
EXTENDING TIME TO
ANSWER**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned
counsel for the parties to this action, that the time for defendant RCN Corporation ("RCN") to
answer, move or otherwise respond to the class action complaint and jury demand filed by
plaintiff is hereby extended to and including October 5, 2011, provided that RCN shall not
assert defenses based on insufficient process or insufficient service of process.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#
DATE FILED: 8/29/11

Dated: New York, New York.
August 22, 2011

REESE RICHMAN LLP

By: Michael E. Reese /pcn

Michael E. Reese
mreese@reeserichman.com
Kim Richmann
krichmann@reeserichman.com
875 Avenue of the Americas 18th Floor
New York, NY 10022
(212) 253-4272

-and-

BINGHAM MCCUTCHEN LLP

By: Peter C. Neger /pcn

Peter C. Neger
peter.neger@bingham.com
Derek Care
derek.care@bingham.com
399 Park Avenue
New York, NY 10022-4689
212.705.7000

Attorneys for RCN Corporation

MILBERG LLP
Sanford P. Dumain
sdumain@milberg.com
Peter E. Seidman
pseidman@milberg.com
Melissa Ryan Clark
mclark@milberg.com
Charles Slidders
cslidders@milberg.com
One Pennsylvania Plaza, 49th Floor
New York, NY 10119
(212) 594-5300

Attorneys for Plaintiff Betsy Feist

SO ORDERED this 28 day of August, 2011.



Hon. John G. Koeltl
United States District Court Judge